
WASHINGTON STATE DEPARTMENT OF ECOLOGY
EASTERN REGIONAL OFFICE
4601 NORTH MONROE
SPOKANE, WASHINGTON 99205-1295

**FINAL** STATEMENT OF BASIS
FOR
AIR OPERATING PERMIT NUMBER 03AQER-5612, 3rd Revision
GAS TRANSMISSION NORTHWEST CORPORATION
COMPRESSOR STATION #8
NEAR
WALLULA, WASHINGTON

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## LIST OF ABBREVIATIONS

| | |
|---|---|
| AOP | Air Operating Permit |
| BACT | Best Available Control Technology |
| BTU | British Thermal Units |
| °C | Degrees Celsius |
| CAM | Compliance Assurance Monitoring |
| CFR | Code of Federal Regulations |
| CO | Carbon Monoxide |
| COMS | Continuous Opacity Monitoring System |
| dscf | Dry Standard Cubic Foot |
| dscf/m | Dry Standard Cubic Foot per minute |
| Ecology | Washington State Department of Ecology |
| E.I.T. | Engineer in Training |
| EPA | United States Environmental Protection Agency |
| °F | Degrees Fahrenheit |
| FCAA | Federal Clean Air Act |
| $ft^3$ | Cubic foot |
| gr/dscf | Grains per dry standard cubic foot |
| hr | Hour |
| lb | Pound |
| MMBtu | Million British Thermal Units |
| MRRR | Monitoring, Recordkeeping, and Reporting Requirement |
| NGG | Gas generator speed in a natural gas turbine |
| NOC | Notice of Construction |
| $NO_x$ | Oxides of Nitrogen |
| NSPS | New Source Performance Standard |
| $O_2$ | Oxygen |
| O&M | Operation & Maintenance |
| P.E. | Professional Engineer |
| PM | Particulate Matter |
| PM-10 | Particulate Matter with aerodynamic diameter ≤ 10 micrometers |
| ppm | Parts per million |
| PSD | Prevention of Significant Deterioration |
| RACT | Reasonably Available Control Technology |
| RCW | Revised Code of Washington |
| RM | EPA Reference Method from 40 CFR Part 60, Appendix A |
| scfm | Standard Cubic Feet per Minute |
| SIP | State Implementation Plan |
| $SO_2$ | Sulfur Dioxide |
| T | Temperature |
| TAP | Toxic Air Pollutant |
| TPD | Tons Per Day |
| TPY | Tons Per Year |
| TSP | Total Suspended Particulate |
| VOC | Volatile Organic Compound |
| WAC | Washington Administrative Code |
| w% | Percentage by Weight |
| yr | Year |

**Natural Gas Combustion Turbines – Annual Potential To Emit in Tons Per Year (tpy)[1]**

| Emission Units | PM-10 | CO | $NO_X$ | $SO_2$ | VOC |
|---|---|---|---|---|---|
| Combustion Turbine 8A | 4.4 | 93.3 | 88 | 1.9 | 1.4 |
| Combustion Turbine 8B | 1.6 | 83.3 | 114.3 | 2.0 | 8.8 |
| Combustion Turbine 8C | 1.7 | 350 | 205.2 | 2.1 | 7.5 |

**Auxiliary Generator – Annual Potential To Emit in Pounds Per Year (lb/yr)**

| Emission Units | PM-10 | CO | $NO_X$ | $SO_2$ | VOC |
|---|---|---|---|---|---|
| Auxiliary Generator | 4.5 | 810 | 960 | 0.6 | 135 |

## 1.0 Introduction

This document sets forth the legal and factual basis for the permit conditions in a FINAL AOP issued by the State of Washington Department of Ecology for a natural gas compressor station located near the town of Wallula, Washington in Walla Walla County. This document is called a "statement of basis" and is required by Washington State regulations [chapter 173-401 WAC]. A statement of basis does not contain enforceable permit conditions. Enforceable permit conditions are contained in the AOP itself.

## 2.0 Facility Identifying Information

**2.1** Company Name ---------- Gas Transmission Northwest Corporation

**2.2** Facility Name ----------Compressor Station #8 – Wallula

**2.3** Unified Business Identification Number---------- 409-012-561

**2.4** Facility Address ----------638 Lambdin Road, 3 miles east of Wallula Junction on U.S. Hwy 12

**2.5** Responsible Official ----------Mr. Ross Parker, Regional Director

Mailing Address ---------- 534 East Trent Avenue, Suite 100, Spokane, Washington 99202

**2.6** Facility Contact----------Mr. Jeffrey S. Pollock, Env. Eng. Supervisor

**2.7** Facility Contact Phone Number----------(509) 533-2834

## 3.0 Basis for Title V Applicability

Gas Transmission Northwest Corporation, Compressor Station #8 – Wallula, is subject to Title V, Air Operating Permit Regulations, due to the emissions of carbon monoxide (CO) and nitrogen oxides ($NO_X$) in excess of 100 tons per year. WAC 173-401-200(17)(b) identifies any source that directly emits or has the potential to emit one hundred tpy or more of any air pollutant as a major source. Major sources are required to obtain Title V permits under 173-401-300(1)(a)(i).

## 4.0 Attainment Classification

The facility is located in an area that is classified as nonattainment for PM-10 and attainment for all other criteria pollutants as of April 2005.

[1] Annual potential to emit values as submitted by the permittee as part of the AOP application or as allowed by the applicable Order.

## 5.0 Title V Facility Timeline

**5.1** December 9, 1994 ---------- Source Initial Notification of Inclusion in Title V AOP Program

**5.2** December 4, 1997 ---------- Original Title V AOP is issued (Order No. DE 97AQ-E129)

**5.3** December 19, 2001 ----------Title V AOP Renewal Application Complete

**5.4** December 3, 2002 ----------Original Title V AOP expired

**5.5** April 4, 2003 ----------Draft Renewal Permit Issued

**5.6** June 27, 2003 ----------Final Renewal Permit Issued (Order No. 03AQER-5612)

**5.7** July 1, 2003 ----------Order No. 03AQER- 5612 Effective Date

**5.8** November 25, 2003 ----------Request for Administrative Amendment Received by Ecology

**5.9** December 3, 2003 ---------- Final Order No. 03AQER-5612, 1st Revision Issued

**5.10** November 17, 2004 ---------- Issuance of NOC Order triggering Re-opening for Cause

**5.11** March 18, 2005 ---------- Draft Order No. 03AQER-5612, 2nd Revision Issued

**5.12** March 25, 2005 ----------Public Comment Period Begins

**5.13** April 25, 2005 ---------- Public Comment Period Ends

**5.14** May 2, 2005 ---------- EPA Review Period Begins

**5.15** June 15, 2005 ----------EPA Review Period Ends

**5.16** June 23, 2005 ----------Final Order No. 03AQER-5612, 2nd Revision Issued & Effective

**5.17** October 17, 2005 ----------Request for Administrative Amendment Received by Ecology

**5.18** February 2, 2006 ---------- Final Order No. 03AQER-5612, 3rd Revision Issued & Effective

**5.19** July 1, 2008 ----------Order No. 03AQER- 5612 Expiration Date

## 6.0 Company Overview and Facility Description

**6.1** Gas Transmission Northwest Corporation (GTN) is a natural gas transmission company operating a pipeline from the Canadian border through the states of Idaho, Washington, and Oregon to California. GTN's dual mainline is 612.5 miles in length and includes 638.9 miles of 36-inch and 589.4 miles of 42-inch pipeline. Energy to move the gas is provided by 12 compressor stations located along the pipeline all of which are designed for remote, unattended operation from GTN's Gas Control Center. Typically, there are two gas turbine driven compressor units at a station.

The function of a natural gas compressor station is to produce gas horsepower, i.e., impart energy to the stream of gas in the pipeline in order to induce flow. The horsepower requirement at a station can vary frequently due to factors such as customer demand, weather conditions, availability of compressor units at adjacent stations, downstream pressure requirements, and receiving pressures and volumes. Consequently, normal operation includes operation of either unit individually or both units together.

The major sources of air emissions at Station 8 are the three gas turbine units, Units 8A, 8B, and 8C. Through valving, natural gas can be diverted through any combination of compressors. In addition, the station can be bypassed entirely. A process flow diagram and facility plot plan are presented in Appendix A. The other stationary fuel combustion units at Station 8 include boilers

used for domestic hot water or space heating and an emergency auxiliary power generator used exclusively for backup power in the event of failure of the outside electrical power supply.

**6.1.1** *General Facility Process Description* – General process facilities (Section 2.1 of the AOP) include plant-wide emissions, such as fugitive dust from vehicle/equipment travel on-site, vented natural gas from piping and equipment, and emissions related to plant-wide support services such as the boilers for space heating, the emergency generator, metal cutting and welding, and other maintenance, housekeeping and miscellaneous insignificant emissions activities. General facility emission limits, work practice standards and order conditions also apply to all three compressor units unless otherwise noted.

**6.1.2** *Compressor Unit 8A* – Section 2.2 of the AOP consists of emissions from Compressor Unit 8A. Unit 8A is a Solar Titan Gas Turbine, 19,500 horsepower (ISO), in operation since 2001. A NSR/PSD review was done prior to the installation and operation of Unit 8A, and BACT was determined to be dry low $NO_x$ combustors. Testing derived emission factors with fuel consumption, operating hours, and periodic source tests are used to monitor $NO_X$ emissions from Unit 8A. Unit 8A is also equipped with monitoring which records when the unit is operating in or out of $SoLoNO_X$ mode.

**6.1.3** *Compressor Unit 8B* – Section 2.3 of the AOP consists of emissions from Compressor Unit 8B. Unit 8B is a Solar Titan Gas Turbine, 17,800 horsepower (ISO), in operation since 1997. A NSR review was done prior to the installation and operation of Unit 7C, and BACT was determined to be dry low $NO_x$ combustors. Verifiable emission factors with fuel consumption, operating hours, and periodic source tests are used to monitor $NO_X$ emissions from Unit 7C.

**6.1.4** *Compressor Unit 8C* – Section 2.2 of the AOP consists of emissions from Compressor Unit 8C. Unit 8C is a Cooper Rolls Coberra 125 Avon, 14,300 hp, in operation since 1970. Since Unit 8C was installed prior to 1977, it is therefore not subject to the underlying regulatory requirements of New Source Performance Standards (NSPS) or Prevention of Significant Deterioration (PSD).

**6.1.5** *Fuel Specifications* – The pipeline-quality natural gas received from Canada and transported by GTN has been processed and stripped of impurities (e.g., hydrogen sulfide) prior to entering the United States. The table below presents a typical fuel analysis for natural gas transmitted through the GTN pipeline system. This pipeline-quality gas is also used to power the gas turbine-driven compressors. Because essentially all sulfur and other impurities are removed from the pipeline gas in Canada, emissions of sulfur compounds are not generated in significant amounts when the gas is burned as fuel by the pipeline gas turbines. Fuel-bound nitrogen rarely exists in natural gas and then only as an impurity. These molecules are longer chain hydrocarbons typically found in the form of proteins or amines. After the natural gas is removed from the ground, the longer chain hydrocarbon impurities condense due to their higher dew point and are extracted at Canadian gas processing facilities. As part of the terms and conditions of GTN's contract, the purchased gas "...shall be commercially free from sand, dust, gums, crude oil, impurities, and other objectionable substances which may be injurious to pipelines or which may interfere with its transmission through pipelines or its commercial utilization..." and "...shall not have a hydrocarbon dew point in excess of fifteen degrees Fahrenheit at pressures up to eight hundred (800) psig."

**Representative Fuel Analysis**

| Component | Volume Percent | Weight Percent |
|---|---|---|
| Carbon dioxide | 0.453 | 1.203 |
| Nitrogen | 0.968 | 1.636 |
| Oxygen | 0.017 | 0.032 |
| Methane | 96.713 | 93.608 |
| Ethane | 1.695 | 3.075 |
| Propane | 0.121 | 0.322 |
| Other Hydrocarbons | 0.033 | 0.124 |
| **Total** | **100.000** | **100.000** |
| | | |
| Calculated specific gravity: | | 0.573 |
| Calculated specific volume ($ft^3$/lb): | | 22.86 |
| Calculated gross heating value (Btu/$ft^3$): | | 1,015 |
| Calculated lower heating value (Btu/$ft^3$): | | 914 |
| Total Sulfur | | <1.0 grains per 100 scf |
| Hg | | 0.032 ng/liter |

Sources:

Zalco Laboratories, Inc., Chromatographic Analysis, Laboratory Test Report No. 035430-001, April 12, 1993 (except total sulfur, mercury, and benzene).
Pacific Gas & Electric, Technical and Ecological Services, Laboratory Test Reports, July 1, 1991 (mercury only).

## 7.0 Facility Emission Units/Processes

**7.1** Facility Wide (Section 2.1 in AOP)

**7.2** Compressor Unit 8A (Section 2.2 in AOP)

**7.3** Compressor Unit 8B (Section 2.3 in AOP)

**7.4** Compressor Unit 8C (Section 2.4 in AOP)

**7.5** Auxiliary Generator (Section 2.5 in AOP)

## 8.0 Insignificant Emission Units and Activities

**8.1** The permittee proposed numerous insignificant emission units as categorically insignificant based on the requirements outlined in WAC 173-401-532. A list of these units is on file with the Department of Ecology's Eastern Region Office, Air Quality Program in Spokane, Washington.

**8.2** The following insignificant emission units were proposed by the permittee in the Title V Renewal Application materials submitted to Ecology and have been found by Ecology to meet the requirements outlined in WAC 173-401-533 as insignificant on the basis of size or production rate.

**8.2.1** Three natural gas boilers for space and water heating (WAC 173-401-533(2)(e) and (r), rated at 1,564,000 BTU/hr, 142,000 BTU/hr, and 36,000 BTU/hr. Combustion sources less than five million BTU/hr exclusively using natural gas, butane, propane, or LPG).

**8.2.2** WAC 173-401-533(2)(i) – Welding using not more than one ton per day of welding rod.

**8.2.3** WAC 173-401-533(2)(q) – Surface coating, using less than two gallons per day.

**8.2.4** WAC 173-401-533(2)(y) – Surface coating, aqueous solution or suspension containing less than one percent VOC's.

**8.2.5** WAC 173-401-533(2)(z) – Cleaning and stripping activities and equipment, using solution having less than one percent VOC's by weight. On metallic substrate, acid solutions are not considered for listing as insignificant.

**8.3** The following emission units and processes were proposed by the permittee in the Title V Renewal Application materials submitted to Ecology as insignificant. Ecology has determined that the units cannot be designated as insignificant emission units under Title V since each of the units has specific requirements that are applicable and include associated monitoring, recordkeeping, and reporting requirements. Insignificant emission units are exempt from monitoring, recordkeeping, and reporting requirements under Title V.

**8.3.1** Sources of fugitive dust are subject to the requirements of Section 2.1 of the AOP.

**8.3.2** The emergency auxiliary power generator is subject to the requirements of Section 2.5 of the AOP as well as the requirements of Section 2.1 of the AOP.

## 9.0 Comments and Corresponding Responses

**9.1** Comments received during the public comment period and EPA review period are on file at Ecology's Eastern Region Office in Spokane, along with Ecology's response to the comments.

## 10.0 Applicable and Inapplicable Requirements Determinations/Explanations

**10.1** Initial or one-time NOC requirements that have not been included in the AOP as ongoing applicable requirements.

**10.1.1** Order No. PSD-01-06 First Amendment, Approval Conditions 4, 11, 12(a), 40 CFR 60.8(a), Initial compliance with the $NO_X$ emission limits shall be determined in accordance with 40 CFR 60 Subpart GG and Appendix A, Reference Method 20, except that the instrument span shall be reduced as appropriate. Within 180 days after initial startup, the permittee shall conduct performance tests for $NO_X$ from the Solar Titan combustion turbine to be performed by an independent testing firm. A test plan shall be submitted to the department (of Ecology) for approval at least 30 days prior to the testing date.

**10.1.1.1** This testing occurred on October 1-3, 2002. The test report was received by Ecology on November 20, 2002 and is located in the facility source testing file at Ecology's Eastern Regional Office in Spokane, Washington. A source test protocol was received by Ecology's Spokane office on September 3, 2002.

**10.1.2** Order No. PSD-01-06 First Amendment, Approval Condition 13, Within ninety (90) days of startup, the permittee shall identify operational parameters and practices that will constitute proper operation of the Solar Titan combustion turbine and the auxiliary generator. These operational parameters and practices shall be included in an operation and maintenance manual (O&M) for the facility.

**10.1.2.1** No record was found in the facility files documenting the completion of the O&M manual(s). However, no initial reporting requirement was included in the PSD permit.

**10.1.3** Order No. PSD-01-06 First Amendment, Approval Condition 14, Within ninety (90) days of this approval, the permittee shall prepare and submit to the department a quality assurance quality control manual for ambient temperature monitoring required.

**10.1.3.1** No record was found in the facility files documenting the completion and submittal of the QA/QC manual for temperature monitoring.

**10.1.4** Order No. 02AQER-3949 First Amendment, Approval Condition 3.6.1, Within 60 days after achieving the maximum production rate at which the source will be operated, but not later than 180 days after the initial startup, the permittee shall conduct initial performance tests, to be performed by an independent testing firm for all pollutants listed.

**10.1.4.1** This testing occurred on October 1-3, 2002. The test report was received by Ecology on November 20, 2002 and is located in the facility source testing file at Ecology's Eastern Regional Office in Spokane, Washington. A source test protocol was received by Ecology's Spokane office on September 3, 2002.

**10.1.5** Order No. 02AQER-3949 First Amendment, Approval Condition 3.8.6, The permittee shall notify Ecology in writing at least 10 days prior to initial startup.

**10.1.5.1** A letter from Mr. Paul Mikolaycik of PG&E GTN addressed to Mr. Greg Flibbert of Ecology was received by Ecology's Eastern Regional Office on July 25, 2002 documenting that initial startup of unit 8A occurred on July 18, 2002. Additionally, notification documenting that the initial startup for the auxiliary generator occurred on April 28, 2002 was received on May 15, 2002.

**10.1.6** Order No. 02AQER-3949 First Amendment, Approval Condition 3.9.1, Emission unit specific (unit 8A and auxiliary generator) O&M manuals shall be developed within thirty (30) days of installation of each emission unit.

**10.1.6.1** No record was located in the facility files documenting the date that the O&M manuals were completed.

**10.1.7** Order No. 02AQER-3949 First Amendment, Approval Condition 3.9.2, Within 90 days of this approval, the permittee shall prepare and submit to the department a quality assurance quality control manual for ambient temperature monitoring as required by the Order.

**10.1.7.1** No record was located in the facility files documenting the date that the QA/QC manual for ambient temperature monitoring was completed. Neither could the manual itself be located.

**10.1.8** Order No. 02AQER-3949 First Amendment, Approval Condition 3.10.6, This Order shall become invalid if construction is not commenced within 18 months after receipt of final approval, if construction is discontinued for a period of 18 months or more, or if construction is not complete within a reasonable time.

**10.1.8.1** The final first amendment to the Order was issued on 11/20/02. The original Order was issued as a final on 06/19/02. Ecology's Eastern Regional Office received notification on 08/08/02 that unit 8A was placed into production mode.

**10.1.9** Order No. 02AQER-3949 First Amendment, Approval Condition 3.10.9, A two week testing an break in period is allowed, after any part or portion of this project becomes

operational, to make any changes or adjustments required to comply with applicable rules and regulations pertaining to air quality and conditions operation imposed herein.

**10.1.9.1** No record of any problems related to the two week break in period were identified within the facility files.

**10.1.10** Order No. DE 97AQ-E135, Approval Conditions 3.2, 3.4, 40 CFR 60.8(a), Initial performance testing for the $NO_X$ emission limit at the turbine exhaust shall be conducted according to RM 20. Such testing shall be conducted within 60 days of achieving the maximum fuel consumption rate of unit 8B, but no later than 180 days after initial startup. Testing for CO shall also be conducted according to RM 10.

**10.1.10.1** Ecology's Eastern Regional Office received a copy of the test report for the initial source testing on June 14, 1999. The testing occurred on May 12, 1999. Correspondence received on April 1, 1999 notifying Ecology that unit 8B became operational on March 27, 1999.

**10.1.11** Order No. DE 97AQ-E135, Approval Conditions 4, 5.7, An O&M manual for unit 8B shall be developed. The permittee shall provide written notification to Ecology of their having completed the O&M manual within 60 days of the initial startup of unit 8B.

**10.1.11.1** Notification that the O&M manual was complete was received by Ecology's Eastern Regional Office on May 17, 1999. An inspection letter from Ted Hamlin dated 3/24/00 documented that the O&M manual was onsite and available for inspection.

**10.1.12** Order No. DE 97AQ-E135, Approval Condition 5.1, 40 CFR 60.7(a)(1), The permittee shall provide written notification to Ecology of the date construction of unit 8B commenced, postmarked no later than 30 calendar days after such date.

**10.1.12.1** Notification that construction commenced on April 8, 1998 was received by Ecology's Eastern Regional Office on April 27, 1998.

**10.1.13** Order No. DE 97AQ-E135, Approval Condition 5.2, 40 CFR 60.7(a)(2), The permittee shall provide written notification to Ecology of the date of initial startup of unit 8B, postmarked not more than 60 calendar days nor less than 30 calendar days prior to such date.

**10.1.13.1** Notification of expected initial startup was received by Ecology's Eastern Regional Office on September 18, 1998. Subsequent correspondence via e-mail was provided by the permittee informing Ecology of installation problems that were occurring related to the project. These problems delayed the startup date until March 27, 1999 as described below.

**10.1.14** Order No. DE 97AQ-E135, Approval Condition 5.3, 40 CFR 60.7(a)(3), The permittee shall provide written notification to Ecology of the actual date of initial startup of unit 8B, postmarked within 15 calendar days after such date.

**10.1.14.1** Notification that unit 8B started up on March 27, 1999 was received at Ecology's Eastern Regional Office on April 1, 1999.

**10.1.15** Order No. DE 97AQ-E135, Approval Conditions 6.5, 8, 8.1, 8.2, No more than two of the three turbine/compressors located at station 8 shall be operated simultaneously. The permittee is required to maintain records of any instance of operation of unit 8B

in conjunction with operation of the units 8C and 8D. If the permittee wishes to operate all three turbine/compressors simultaneously, the permittee shall submit a PSD application.

**10.1.15.1** Unit 8D was permanently removed as stated in correspondence from the permittee dated October 11, 2001. Therefore, this requirement no longer has any meaning, and therefore no longer requires any action on the part of the permittee. Unit 8A was permitted under NSR/PSD in 2001-2002 and the permits did not include any limitation on operation with respect to the other units at station 8.

**10.1.16** Order No. DE 97AQ-E135, Approval Condition 9.2, This approval Order becomes void if construction of the project (installation of unit 8B) is not commenced within 18 months after receipt of the final Order approving the Notice of Construction, or if construction, once commenced, is discontinued for a period of 18 months.

**10.1.16.1** The final Order was issued on August 27, 1997. Notification that construction commenced on April 8, 1998 was received by Ecology's Eastern Regional Office on April 27, 1998. Notification that unit 8B started up on March 27, 1999 was received at Ecology's Eastern Regional Office on April 1, 1999.

**10.2** The following NOC requirements clarified miscellaneous issues or included explanatory statements with regard to the applicable emission unit and were not, in actuality, approval conditions that require any action on the part of the permittee. These NOC requirements therefore have not been included in the AOP as ongoing applicable requirements.

**10.2.1** Order No. 02AQER-3949 First Amendment – Approval Condition 1.0, Laws and Regulations.

**10.2.1.1** This approval condition states that the installation of the new combustion turbine (unit 8A) and the new auxiliary generator qualify as a new source of air contaminants.

**10.2.2** Order No. 02AQER-3949 First Amendment – Approval Condition 2.1, Estimated Emissions.

**10.2.2.1** This approval condition states the estimated emissions that are expected from the installation of combustion turbine unit 8A and the new auxiliary generator.

**10.2.3** Order No. 02AQER-3949 First Amendment – Approval Condition 2.2, Ambient Modeling.

**10.2.3.1** This approval condition discusses the ambient impact of the installation of unit 8A and the auxiliary generator, and outlines the modeling that was performed in order to evaluate these impacts.

**10.2.4** Order No. 02AQER-3949 First Amendment – Approval Conditions 3.2, 3.2.1, T-BACT.

**10.2.4.1** This approval condition describes the T-BACT regulations generally and also discusses the method used to estimate the emissions from the turbine and auxiliary generator.

**10.2.5** Order No. 02AQER-3949 First Amendment – Approval Condition 3.2.2.

**10.2.5.1** This approval condition gives the results of the air pollution dispersion modeling that was done for toxic air pollutants emitted from unit 8A and the auxiliary generator.

**10.2.6** Order No. 02AQER-3949 First Amendment – Approval Condition 3.3.1.

**10.2.6.1** This approval condition describes the three different operating scenarios under which the turbine (unit 8A) will operate. The first operating scenario is at ambient temperatures between 0 °F and 100 °F and NGG greater than 94%. This scenario results in the lowest emissions. The second scenario is at ambient temperatures between 0 °F and 100 °F and NGG between 90% and 94%. The third scenario is at ambient temperatures between -40 °F and 0 °F and NGG between 90% and 100%. This last scenario will have the greatest emissions.

**10.2.7** Order No. 02AQER-3949 First Amendment – Approval Condition 3.7.1.

**10.2.7.1** A portion of this approval condition provides the following explanatory information. The condition states that the permit application stated that annual emissions of CO from transient conditions would equal 14.76 tons. The condition also explained that if the pilot light on the turbine is on, this indicates that the unit is firing auxiliary fuel to stabilize the flame and thus, the turbine is not operating in $SoLoNO_X$ mode. As required under 1) b) of **9M** in the AOP, the pilot light is monitored by a counter which produces data used to calculate emissions based on the duration that the turbine operates in and out of $SoLoNO_X$ mode.

**10.2.8** Order No. 02AQER-3949 First Amendment – Approval Condition 3.8.1.

**10.2.8.1** This approval condition requires that "Records shall be kept of all periods of downtime of the monitors required by Condition 3.6.2". Review of Condition 3.6.2 of this requirement indicates that this condition does not require monitors. However, it is clear that a typographical mistake has been made, and that condition 3.8.1 refers to the monitors required under conditions 3.7.1 and 3.7.2 of the Order. The requirement to keep records of the downtime of these monitors has been included as a requirement of the AOP under the authority of WAC 173-401-630(1).

**10.3** The following requirements were listed as inapplicable by the source, but have been found to be applicable by Ecology.

| | | |
|---|---|---|
| **10.3.1** | WAC 173-400-045 | Control Technology Fees – This section of the WAC includes some requirements that potentially require action on the part of the source. See Standard Condition 1.21 of the AOP. |
| **10.3.2** | WAC 173-400-060 | Emission Standards for General Process Units – This section of the WAC includes some requirements that potentially require action on the part of the source. See Condition 2.1.2 of the AOP. |
| **10.3.3** | WAC 173-400-105 | Records, Monitoring and Reporting Requirements – This section of the WAC includes some requirements that potentially require action on the part of the source. See Standard Condition 1.6 of the AOP. |

| | | |
|---|---|---|
| **10.3.4** | WAC 173-400-107 | Excess Emissions – This section of the WAC includes some requirements that potentially require action on the part of the source. See Standard Condition 1.12 of the AOP. |
| **10.3.5** | WAC 173-400-110 | New Source Review – This section of the WAC includes some requirements that potentially require action on the part of the source. See Standard Condition 1.20 of the AOP. |
| **10.3.6** | WAC 173-400-113 | Requirements for New Sources in Attainment or Unclassifiable Areas – This section of the WAC includes some requirements that potentially require action on the part of the source. See Standard Condition 1.20 of the AOP. |
| **10.3.7** | WAC 173-400-114 | Requirements for Replacement or Substantial Alteration of Emission Control Technology at an Existing Stationary Source – This section of the WAC includes some requirements that potentially require action on the part of the source. See Standard Condition 1.21 of the AOP. |
| **10.3.8** | WAC 173-400-115 | Standards of performance for new sources – Since some sections of 40 CFR 60 (Standards of Performance for New Sources, 40 CFR 60.7(a), (b), (f), 60.8, 60.11(d), 60.48c(g), (i)) do apply to the permittee, this Washington State regulation, which incorporates 40 CFR 60 by reference, is applicable to the permittee for those specific sections of 40 CFR 60 which apply. |
| **10.3.9** | WAC 173-400-116 | New Source Review Fees – This section of the WAC includes some requirements that potentially require action on the part of the source. See Standard Condition 1.20 of the AOP. |
| **10.3.10** | WAC 173-400-141 | Prevention of Significant Deterioration – This section of the WAC includes some requirements that potentially require action on the part of the source. See Standard Condition 1.20 of the AOP. |
| **10.3.11** | chapter 173-460 WAC | Controls for New Sources Of Toxic Air Pollutants – This section of the WAC includes some requirements that potentially require action on the part of the source. See Standard Condition 1.20 of the AOP. |
| **10.3.12** | 40 CFR 60 | Standards of Performance for New Stationary Sources – The NSPS includes some requirements that require action on the part of the source. See Standard Conditions 1.6, 1.13, and 1.27 and Conditions 2.3.3, 2.3.5, 2.3.9, 2.3.11, and 2.3.13 of the AOP. |

**10.4** The permittee included in their application a long list of requirements for which they requested Ecology to determine inapplicability and grant the permit shield to the Wallula facility. Except for the requirements listed in section 4 of the AOP, Ecology has not included any of the other

requirements in the permit either as applicable or inapplicable. The intent of the permit shield is to address situations where there is a question of applicability. The requirements in section 4 of the AOP are good examples of requirements that reasonably might apply and for which an inapplicability determination is both useful and appropriate to document for the public record. Other requirements listed in the application either don't meet the definition of applicable requirement because they are requirements on Ecology, EPA, or a local regulatory agency rather than on the source or because they are obviously not relevant to the operations of a natural gas compressor station. Including this long list in the permit as inapplicable would serve no purpose and could obfuscate the determination of inapplicability for the relevant standards by making it difficult for the public, EPA, and even the permittee to pick out and carefully evaluate the few standards which could truly be in question. Instead, each requirement has been included below, with a brief explanation of it's inapplicability to the permittee.

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| **10.4.1** | 40 CFR 50 | National Primary and Secondary Ambient Air Quality Standards – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.2** | 40 CFR 51 | Requirements for Preparation, Adoption, and Submittal of Implementation Plans – This regulation inherently does not apply to the permittee. |
| **10.4.3** | 40 CFR 53 | Ambient Air Monitoring Reference and Equivalent Methods – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.4** | 40 CFR 54 | Prior Notice of Citizen Suits – The purpose of this part is to prescribe procedures governing the giving of notices as a prerequisite to the commencement of such actions (citizen suits under the CAA). This regulation does not include requirements which apply directly to the permittee. |
| **10.4.5** | 40 CFR 55 | Outer Continental Shelf Air Regulations – The permittee is not an OCS source, and is therefore not subject to these regulations. |
| **10.4.6** | 40 CFR 56 | Regional Consistency – These regulations govern methods employed to achieve fairness and uniformity on the part of EPA and do not require any action on the part of the source. |
| **10.4.7** | 40 CFR 57 | Primary Nonferrous Smelter Orders – The permittee does not operate this type of facility. |
| **10.4.8** | 40 CFR 58 | Ambient Air Quality Surveillance – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.9** | 40 CFR 61 | Emission Standards for Sources Emitting Hazardous Air Pollutants – The source does not emit significant amounts of any hazardous air pollutant. |
| **10.4.10** | 40 CFR 62 | Approval and Promulgation of State Plans for Designated Facilities and Pollutants – This regulation does not include requirements which apply directly to the permittee. |

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| **10.4.11** | 40 CFR 63 | Emission Standards for Sources Emitting Hazardous Air Pollutants – The source does not emit significant amounts of any hazardous air pollutant. |
| **10.4.12** | 40 CFR 65 | Consolidated Federal Air Rule – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.13** | 40 CFR 66 | Assessment and Collection of Noncompliance Penalties by EPA – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.14** | 40 CFR 67 | EPA Approval of State Noncompliance Penalty Program – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.15** | 40 CFR 68 | Chemical Accident Prevention Provisions – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.16** | 40 CFR 69 | Special Exemptions from Requirements of the CAA – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.17** | 40 CFR 71 | Federal Operating Permits Program – This rule applies to the state implementation of the operating permit programs. This regulation does not include requirements which apply directly to the permittee. |
| **10.4.18** | 40 CFR 72 | Permits Regulation – This facility is not subject to the acid rain program. |
| **10.4.19** | 40 CFR 73 | Sulfur Dioxide Allowance System – This facility is not subject to the acid rain program. |
| **10.4.20** | 40 CFR 75 | Continuous Emission Monitoring – This facility is not subject to the acid rain program. |
| **10.4.21** | 40 CFR 76 | Acid Rain Nitrogen Oxides Emission Reduction Program – This facility is not subject to the acid rain program. |
| **10.4.22** | 40 CFR 77 | Excess Emissions – This facility is not subject to the acid rain program. |
| **10.4.23** | 40 CFR 78 | Appeal Procedures for Acid Rain Program – This facility is not subject to the acid rain program. |
| **10.4.24** | 40 CFR 79 | Registration of Fuels and Fuel Additives – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.25** | 40 CFR 80 | Regulation of Fuels and Fuel Additives – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.26** | 40 CFR 81 | Designation of Areas for Air Quality Planning Purposes – This regulation does not include requirements which apply directly to the permittee. |

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| **10.4.27** | 40 CFR 82 | Protection of Stratospheric Ozone – The majority of the requirements included in this part do not apply to the permittee. However, subparts E (Labeling of Products using Ozone Depleting Substances) and F (Recycling and Emissions Reduction) apply generally nationwide. |
| **10.4.28** | 40 CFR 85 | Control of Air Pollution From Mobile Sources – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.29** | 40 CFR 86 | Control of Emissions From New and In-Use Highway Vehicles and Engines – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.30** | 40 CFR 87 | Control of Air Pollution From Aircraft and Aircraft Engines – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.31** | 40 CFR 88 | Clean Fuel Vehicles – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.32** | 40 CFR 89 | Control of Emissions from New and In-use Non-road Engines – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.33** | 40 CFR 93 | Determining Conformity of Federal Actions to State or Federal Implementation Plans – This regulation does not include requirements which apply directly to the permittee. |
| **10.4.34** | chapter 463-39 WAC | Energy Facility Site Evaluation Council (EFSEC): General and Operating Permit Regulation for Air Pollution Sources – The regulations included under this section of the WAC apply only to those facilities under the jurisdiction of the EFSEC. The permittee is not currently under this jurisdiction. |
| **10.4.35** | chapter 246-247 WAC | DOH: Radioactive Air Emissions - The permittee is not currently required to take any action under this regulation. |
| **10.4.36** | chapter 173-495 WAC | Weather Control – The permittee does not operate any weather controlling equipment. |
| **10.4.37** | chapter 173-492 WAC | Motor fuel specifications for oxygenated gasoline – This regulation inherently does not apply to the permittee. |
| **10.4.38** | chapter 173-491 WAC | Emissions Standards and Controls for sources emitting gasoline vapors – The permittee does not operate any gasoline marketing operations. |
| **10.4.39** | chapter 173-490 WAC | Emission Standards and Controls for Sources Emitting VOC's - The permittee is not located in an ozone nonattainment area or included in the WAC 173-490-030 listing. |

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| **10.4.40** | chapter 173-481 WAC | Ambient Air Quality and Environmental Standards for Fluorides - The permittee is not currently required to take any action under this regulation. |
| **10.4.41** | chapter 173-480 WAC | Ambient Air Quality Standards and Emission Limits for Radionuclides - The permittee is not currently required to take any action under this regulation. |
| **10.4.42** | chapter 173-450 WAC | Financial Aid to authorities – This regulation inherently does not apply to this source. |
| **10.4.43** | chapter 173-435 WAC | Emergency Episode Plans – The permittee is not currently required to take any action under this regulation. |
| **10.4.44** | chapter 173-434 WAC | Solid Waste Incineration – The permittee is not in this source category. |
| **10.4.45** | chapter 173-430 WAC | Agricultural Burning – The permittee does not perform agricultural activities. |
| **10.4.46** | chapter 173-422 WAC | Motor Vehicle Emission Inspection – This regulation inherently does not apply to this source. |
| **10.4.47** | chapter 173-421 WAC | Motor Vehicle Emission Control Systems – This regulation inherently does not apply to this source. |
| **10.4.48** | chapter 173-420 WAC | Conformity of Transportation Plans with SIP – This regulation inherently does not apply to this source. |
| **10.4.49** | chapter 173-415 WAC | Primary Aluminum plants – The permittee is not in this source category. |
| **10.4.50** | chapter 173-410 WAC | Sulfite Pulping mills – The permittee is not in this source category. |
| **10.4.51** | chapter 173-405 WAC | Kraft Pulping mills – The permittee is not in this source category. |
| **10.4.52** | chapter 173-401 WAC | Operating Permit Regulation – The regulations included in Chapter 173-401 WAC are the guidelines apply to Washington State's Operating Permit Program and do not include specific requirements that apply to the source. This can be a source of confusion because Operating Permits include requirements that are authorized by Chapter 173-401 WAC. However, these requirements technically do not apply to the source until they are included in an Operating Permit. |
| **10.4.53** | WAC 173-400-010 | Policy and Purpose – This section of the WAC does not contain any requirements that require the source to take action of any kind. |
| **10.4.54** | WAC 173-400-020 | Applicability – This section of the WAC does not contain any requirements that require the source to take action of any kind. |

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| **10.4.55** | WAC 173-400-030 | Definitions – This section of the WAC does not contain any requirements that require the source to take action of any kind. |
| **10.4.56** | WAC 173-400-040(3)(b) | RACT for emissions units identified as significant contributors to non attainment status of the region – Source is not currently located in a nonattainment area. |
| **10.4.57** | WAC 173-400-040(8)(b) | RACT for emissions units identified as significant contributors to the PM-10 non attainment status of the region – Source is not currently located in a nonattainment area. |
| **10.4.58** | WAC 173-400-050(2) | Incineration units standards – Facility does not operate an incinerator. |
| **10.4.59** | WAC 173-400-070 | Emission standards for certain source categories – Facility does not operate sources in these specific categories. |
| **10.4.60** | WAC 173-400-075 | Emission Standards for Sources Emitting Hazardous Air Pollutants – The source does not emit significant amounts of any hazardous air pollutant. |
| **10.4.61** | WAC 173-400-081 | Startup and Shutdown – This section of the WAC does not contain any requirements that require the source to take action of any kind. |
| **10.4.62** | WAC 173-400-091 | Voluntary Limits on Emissions – This section of the WAC does not contain any requirements that require the source to take action of any kind. |
| **10.4.63** | WAC 173-400-100 | Source Registration Program – AOP sources are exempt from registration (WAC 173-400-101(7)). |
| **10.4.64** | WAC 173-400-101 | Registration Issuance – AOP sources are exempt from registration per WAC 173-400-101(7), this exemption would fail should the source's AOP status change. |
| **10.4.65** | WAC 173-400-112 | Requirements for new sources in nonattainment areas – Source is not currently located in a nonattainment area. |
| **10.4.66** | WAC 173-400-120 | Bubble rules – Source is not currently utilizing the option provided by these rules. This requirement will become applicable upon the permittee's request to utilize the provisions provided by bubble rules. |
| **10.4.67** | WAC 173-400-131 | Issuance of emission reduction credits – The permittee is not currently utilizing the option provided by these rules. This requirement will become applicable upon the permittee's request for emission reduction credit. |
| **10.4.68** | WAC 173-400-136 | Use of emission reduction credits – The permittee is not currently utilizing the option provided by these rules. This requirement will become applicable upon the permittee's request for emission reduction credit. |

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| **10.4.69** | WAC 173-400-151 | BART for sources Impacting Class I Areas – The facility is not in or near any class I area. |
| **10.4.70** | WAC 173-400-161 | Compliance Schedules – This section of the WAC includes requirements that apply to the process governing the issuance of compliance schedules. |
| **10.4.71** | WAC 173-400-171 | Public Involvement – This section of the WAC outlines the public involvement processes that govern the actions of the permitting authority. |
| **10.4.72** | WAC 173-400-180 | Variance – The permittee is not currently utilizing the option provided by these rules. This requirement will become applicable upon request for a variance by the permittee. |
| **10.4.73** | WAC 173-400-190 | Requirements for nonattainment areas – Source is not located in a nonattainment area. |
| **10.4.74** | WAC 173-400-210 | Emission Requirements of Prior Jurisdictions – No emission requirements of prior jurisdictions apply to the permittee. |
| **10.4.75** | WAC 173-400-220 | Ecology Board Member Salary Derivation Requirements – This regulation inherently does not apply to this source. |
| **10.4.76** | WAC 173-400-230 | Regulatory Actions – This section of the WAC does not contain any requirements that require the source to take action of any kind. |
| **10.4.77** | WAC 173-400-240 | Criminal Penalties – This section of the WAC does not contain any requirements that require the source to take action of any kind. |
| **10.4.78** | WAC 173-400-250 | Appeals – This section of the WAC does not contain any requirements that require the source to take action of any kind. |
| **10.4.79** | WAC 173-400-260 | Ecology Board Member Conflict of Interest Requirements – This regulation inherently does not apply to this source. |

**10.5** The following requirements were listed as applicable by the source, but have been found to be inapplicable by Ecology.

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| **10.5.1** | WAC 173-475 | Ambient Air Quality Standards for Carbon Monoxide, Ozone, and Nitrogen Dioxide - The permittee is not currently required to take any action under this regulation. |
| **10.5.2** | WAC 173-474 | Ambient Air Quality Standards for Sulfur Oxides - The permittee is not currently required to take any action under this regulation. |
| **10.5.3** | WAC 173-470 | Ambient Air Quality Standards for Particulate Matter - The permittee is not currently required to take any action under this regulation. |

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| **10.5.4** | WAC 173-401-925 | Source data statements and petition for review of statements – The permittee is not currently required to take any action under this regulation. |
| **10.5.5** | WAC 173-401-830 | This regulation was found to not exist. |
| **10.5.6** | WAC 173-401-735 | Permit Appeals – The permittee is not currently required to take any action under this regulation. |
| **10.5.7** | WAC 173-401-533 | Units and activities designated as insignificant on the basis of size or production rate – This regulation identifies IEU's that qualify based on size or production rate. IEU's established under this regulation are discussed in section 8.2 of this SOB. The permittee is not required to take any action under this regulation. |
| **10.5.8** | WAC 173-401-532 | Categorically exempt insignificant emission units – This regulation identifies IEU's that qualify categorically. These IEU's are discussed in section 8.1 of this AOP. The permittee is not required to take any action under this regulation. |
| **10.5.9** | WAC 173-401-531 | Thresholds for hazardous air pollutants – This regulation does not in itself require any action on the part of the permittee. |

**11.0 Monitoring, Recordkeeping, and Reporting Requirement (MRRR) Sufficiency Explanations** – The following section provides brief discussions regarding the reasoning behind the MRRR's included as part of the AOP. The criterion is that each MRRR must be sufficient to assure compliance with the associated condition, emission standard or work practice.

**11.1** MRRR **1M** – No specific monitoring can reasonably be required for these requirements. The nature of the requirements makes it necessary to rely on the good faith of the permittee to conscientiously monitor site operations and to promptly report any deviations.

**11.2** MRRR **2M** – This monitoring is used for conditions that require the source to maintain a certain status quo (e.g., O&M manual accessible to employees in operation of the equipment; maintaining replacement parts for routine repairs to monitoring equipment). To assure compliance with these provisions, the permittee is simply required to check that there has been no change in the status quo. Since such a change is unlikely, an annual inspection was deemed adequate.

**11.3** MRRR **3M** – This MRRR was designed to provide sufficient response to complaints regarding facility emissions and odors affecting the landowners neighboring or in the affected vicinity of the facility. Timeframes were chosen to provide the permittee with adequate time to respond appropriately as well as ensuring that complaints not go unnoticed.

**11.4** MRRR **4M** – The monitoring has been designed to require periodic reviews of Operation and Maintenance manuals and other documents in order to evaluate whether current operational practices are being conducted in a manner consistent with the information upon which permitting has been based. The recordkeeping and reporting required ensure that practices which are not consistent with the submitted information will be addressed in a timely manner.

**11.5** MRRR **5M** – The monitoring has been designed to require periodic walk-around surveys as the most simple and direct method to determine the presence of excess emissions. The surveys

include the requirement to perform RM 9 if visible emissions are observed and are not eliminated within a reasonable time frame. These surveys, in conjunction with a good faith effort on the part of the permittee to operate in accordance with the conditions of the AOP, are considered sufficient monitoring.

**11.6** MRRR **6M** – The monitoring as specified has been designed based on the condition that all associated equipment is maintained in proper working condition. Using emission factors in conjunction with operational parameters is a feasible method of estimating emissions from an emission unit for which performance testing may not be feasible. The monitoring was designed with the goal of providing the permittee with sufficient opportunity to respond to upsets appropriately while at the same time avoiding significant environmental degradation.

**11.7** MRRR **7M** – This monitoring has been specified to include the estimation of emissions based on the use of emission factors, as described in 11.6 above. In addition, periodic source testing has been added to the monitoring due to the size of the emission unit.

**11.8** MRRR **8M** – This monitoring has been specified to rely on periodic source testing in order to gain a reasonable assurance of compliance with the various pollutant limits that apply to the unit 8A. Source testing is the most reliable method for determining emissions, and due to the size of the emission unit and the requirements that apply, testing is deemed reasonable.

**11.9** MRRR **9M** – This MRRR establishes the minimum monitoring, recordkeeping and reporting information necessary for reasonable assurance of compliance with the appropriate requirements applicable to the turbine. The turbine is subject to the requirements of 40 CFR 60 Subpart GG, which requires fuel monitoring for sulfur and nitrogen.

**11.10** MRRR **10M** – This MRRR establishes the minimum recordkeeping information necessary for reasonable assurance of compliance with the appropriate requirements applicable to the O&M manual for unit 8A.

**11.11** MRRR **11M** – The monitoring is included specifically as required by 40 CFR 60.

**11.12** MRRR **12M** – This monitoring has been specified to rely on periodic source testing in order to gain a reasonable assurance of compliance with the various pollutant limits that apply to the unit 8B. Source testing is the most reliable method for determining emissions, and due to the size of the emission unit and the requirements that apply, testing is deemed reasonable.

**11.13** MRRR **13M** – This MRRR establishes the minimum monitoring, recordkeeping and reporting information necessary for reasonable assurance of compliance with the appropriate requirements applicable to the turbine. The turbine is subject to the requirements of 40 CFR 60 Subpart GG, which requires fuel monitoring for sulfur and nitrogen. These requirements are met by the monitoring imposed by Order No. 02AQER-3949 First Amendment.

**11.14** MRRR **14M** – This MRRR establishes the minimum recordkeeping information necessary for reasonable assurance of compliance with the appropriate requirements applicable to the O&M manual for unit 8B.

**11.15** MRRR **15M** – This MRRR establishes the minimum monitoring, recordkeeping and reporting information necessary for reasonable assurance of compliance with the appropriate requirements applicable to the auxiliary generator.

## 12.0 Streamlining Explanations

**12.1** Order No. 02AQER-3949 First Amendment, Issued 11/20/02, Approval Condition 3.4.6 – Emissions of $NO_X$ from unit 8A – This requirement limits $NO_X$ emissions to 88.5 tons per year on a twelve-month rolling basis. This applicable requirement has not been included in the AOP

due to the fact that the second amendment of the PSD permit contains an emission limitation for $NO_X$ (condition 4) that limits emissions to 88.0 tons per year on a twelve-month rolling basis. Since the condition included in the first amendment to the PSD Order is more stringent than the condition included in the first amendment to the NOC Order, it is appropriate to apply streamlining to this requirement.

**12.2** 40 CFR 60.332, Emission Standard for Nitrogen Oxides – Based on the most conservative assumptions, the most restrictive emission limitation that may be imposed by subpart GG would be 75 ppmv. This applicable requirement has not been included in the AOP due to the fact that the first amendment of Order PSD-01-06 (for unit 8A) and NOC Order No. DE 97AQ-E135 (for unit 8B) contain emission limitations for $NO_X$ that limit emissions to either 25 ppm or 42 ppm. Since the conditions included in the first amendment to the PSD Order and the NOC Order are more stringent than any limit imposed by subpart GG, it is appropriate to apply streamlining to this requirement.

## 13.0 Clarifications and Interpretations

**13.1** Section 1 - Standard Conditions – For permit conditions required by Washington State regulations that have been included in the SIP, two dates are given. The first date is the date for the regulation that was adopted into the SIP. The second date is for the most up-to-date version of the regulation. State-only enforceable permit conditions are identified with the symbol (S).

**13.2** WAC 173-401-620(1) – Acid Rain Provisions. The permittee is not an affected source as specified in the referenced section of the WAC. Due to this, no permit conditions relating to the acid rain provisions of the FCAA have been included in the AOP.

**13.3** WAC 173-401-510(2)(h)(i) – Compliance Plan. At the time of permit issuance, no ongoing applicable requirements have been identified with which the permittee is not currently in compliance. However, this does not preclude Ecology from taking future action on past non-compliance.

**13.4** Chapter 173-425 WAC, Open Burning – The requirements restricting open burning in the State of Washington apply to the source, and therefore Chapter 173-425 has been included as an applicable requirement under Section 2.1 Facility Wide Requirements.

**13.5** Condition 2.1.1 of AOP, Visible Emissions – WAC 173-400-040(1), (1)(a), and (1)(b) restrict visible emissions from all sources of air emissions throughout the source to 20% opacity for no longer than three (3) minutes in any one hour. While it is clear from the time periods contained within the regulation that Ecology Method 9A ("Source Test Manual – Procedures for Compliance Testing", State of Washington, Department of Ecology, 07/12/90) was the test method intended to be used to verify compliance, this permit has specified EPA Reference Method 9 as the test method utilized as part of MRRR **5M**. Ecology has determined that reasonable assurance of compliance with the regulation may be obtained by conducting RM 9 upon observance of visible emissions, as specified within **5M**.

**13.6** Compressor Turbine 8C – Unit 8C was installed in 1970. Due to this, the unit is not subject to the requirements included under the NSPS or PSD permitting programs. The unit is only subject to general statewide standards and the associated monitoring, recordkeeping and reporting requirements.

**13.7** Standard Condition 1.13.4, Emission Inventory – The requirements contained in this standard condition shall be met by the monitoring submittal requirements contained within the AOP provided sufficient emission information is provided.

**13.8** MRRR 6M and 7M of AOP – The correction for oxygen content as prescribed by 6M and 7M should be performed according to the method outlined in 40 CFR 60 Appendix A, Reference Method 19.

**13.9** NGG – Gas Generator Speed – Gas generator speed is the unit given to quantify the production output of a natural gas turbine generator. NGG is expressed in revolutions per minute (rpm), but is not constant for any one turbine/generator combination. The maximum power that a certain turbine/generator can impart to a gas stream depends on several conditions, primarily the temperature of the ambient air stream. Because of this, maximum NGG varies depending on conditions. Many permit conditions have been written in terms of "%" of maximum NGG. This means the percent of what the maximum is under the conditions that exist at any one time.

**13.10** Unit 8B Averaging Time for $NO_X$ Emission Limit – The limitation on $NO_X$ emission rate imposed by condition 3.2 of Order No. DE 97AQ-E135 (AOP Condition 2.3.3) did not include an averaging period over which to evaluate compliance. In accordance with WAC 173-401-615(1)(b), the averaging period has been specified as 1 hour.

**13.11** Unit 8B Source Testing Frequency – The initial source testing, which occurred on May 12, 1999 indicated that $NO_X$ emission rates were less than 80% of the permitted limit. Due to this, the source testing frequency for $NO_X$ has been decreased to once every five years conditional on future testing results (see **12M**) in accordance with Order No. DE 97AQ-E135.

**13.12** Concurrent Operation of the Units at Station 8 – Prior to installation and permitting of unit 8A, only two compressor/turbine units were permitted to operate simultaneously at station 8. This limitation was introduced during the original permitting of unit 8B. Correspondence received by Ecology on October 11, 2001 from the permittee stated that unit 8D had been permanently removed from service. The original unit 8C remains onsite. When unit 8A was installed, the project went through all necessary permitting (NSR/PSD) to allow operation of all three compressor units currently installed (units 8A, 8B, and 8C) simultaneously.

**13.13** Condition 2.2.3 of AOP – During the forty-five day EPA review period of the 2003 renewal AOP issuance, it was discovered that the following language from condition 3.4.3 of Notice of Construction Order No. 02AQER-3949 1st Amendment had been mistakenly omitted from the Draft and Proposed versions of the renewal AOP; "…until a revised emission factor can be developed during the performance testing". This language has been added to the final renewal AOP to ensure consistency with the provisions of the underlying construction permit. Ecology determined that this slight change did not warrant reprocessing of the permit through the public comment period and EPA review period due to the nature of the change and the lack of public comment on the permitting action.

## 14.0 Appendix A – PG&E GTN Compressor Station #8 – Wallula, Property Legal Description, and Process Flow Diagram

**14.1** Process Flow Diagram

**14.2** Legal Description of Property and Property Plot Plans